

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Charles L. Brown and Tyheise K. Brown,

Debtors.

Case No. 20-12727-PMM

Chapter 13

Debtors' Motion to Modify Chapter 13 Plan


AND NOW, Debtors Charles L. Brown and Tyheise K. Brown, by and through their attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtors state as follows:

1. The Debtors filed this case under chapter 13 on June 22, 2020.
2. The trustee in this case is Kenneth E. West.
3. The plan was confirmed on January 20, 2021.
4. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
5. The Debtors want to amend their plan to resolve the dismissal motion.
6. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtors' monthly plan payments moving forward.
7. The Debtors' have filed a Supplement to Schedule I/J to show feasibility.
8. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 65 as the new confirmed plan.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in his favor as may be necessary and proper under the law.

Date: March 17, 2025

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